

EXHIBIT 25

From: Prysby, Mike (DEQ)
Sent: Wednesday, March 27, 2013 3:12 PM
To: Busch, Stephen (DEQ)
Subject: FW: Flint River as a Source
Attachments: Flint WTP Report Revised August 29, 2011.pdf

Here's the Flint WTP 2011 report -- all 91 pages of it....I am going through it looking for the high points

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From: Brent Wright [<mailto:bwright@cityofflint.com>]
Sent: Wednesday, March 27, 2013 3:01 PM
To: Prysby, Mike (DEQ)
Subject: Flint River as a Source

Hope this works...Brent

July 2011

Analysis of the Flint River as a Permanent Water Supply for the City of Flint

Prepared for:

City of Flint

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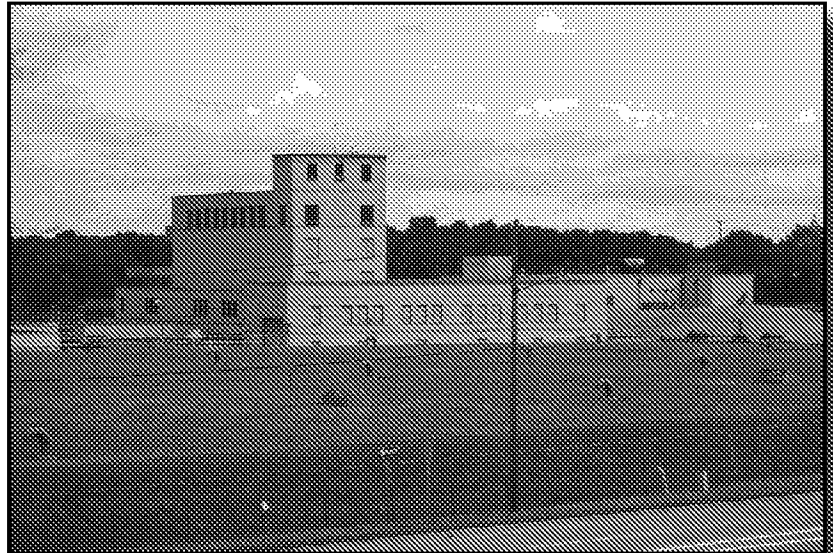
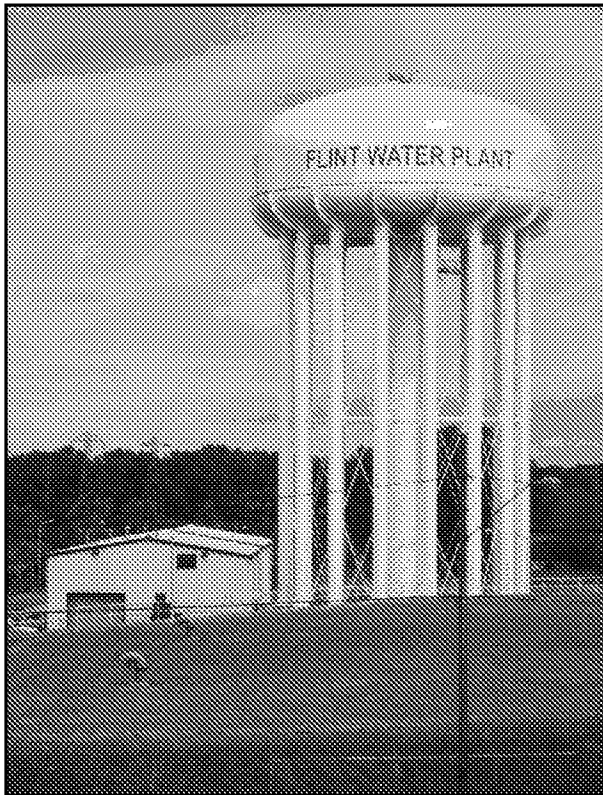


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I. Purpose

This study evaluates the feasibility of utilizing the City of Flint's Water Treatment Plant (WTP) and Flint River as the primary water supply for the City of Flint. The study evaluates whether the Flint River is an adequate source of water for the City of Flint and identifies upgrades needed to reliably supply water on a continuous basis.

II. History

The City of Flint's WTP was constructed in 1917 and supplied water to city customers for drinking and industrial uses. Records indicate that Flint supplied approximately 16 mgd in 1940 and that by the mid-1950s water use had increased to about 45 mgd. This significant increase coincided with increases in automobile production and population in the area. The Holloway Reservoir was constructed in 1954 to increase water supply capacity to meet the growing demand. Because of continued concerns regarding the adequacy of the Flint River for meeting the future water supply needs of the area, the city evaluated alternatives for a new water supply and ultimately contracted with the City of Detroit in 1967 for water supply. Detroit continues to supply water to Flint and its customers today. Detroit supplies finished water to the city via a single transmission pipeline. For reliability, the city's WTP has been maintained as a backup water supply in the event of a disruption to the single supply pipeline.

Because of recent concerns with the cost and reliability of the existing water supplies, the City of Flint, Genesee County, Lapeer County, the City of Lapeer, and Sanilac County are evaluating alternatives for their long-term water supply. The most recent study (Preliminary Engineering Report, Lake Huron Supply, Karegnondi Water Authority; September 2009) focused on two primary alternatives: Alternative 1 – continued supply by Detroit, and Alternative 2 – development of a new Lake Huron water supply. This study evaluates a third alternative. Alternative 3 provides for utilizing the existing City of Flint WTP to treat water from the Flint River. Alternative 3 assumes that water will be supplied only to customers within the city.

To evaluate the feasibility of Alternative 3, the river and WTP will be examined to determine their ability to supply water in sufficient quantity meeting current and anticipated regulations. There have been many new rules and regulations for treatment of surface water since 1967 when Flint's WTP was last used as a primary water supply.

III. Regulatory Requirements for Quantity of Source Water

Regulations require that the quantity of water at the source shall:

- Be adequate to meet the maximum projected water demand of the service area as shown by calculations based on a one in fifty year drought or the extreme drought of record, and should include consideration of multiple year droughts. Requirements for flows downstream of the intake shall comply with requirements of the appropriate reviewing authority.
- Provide reasonable surplus for anticipated growth.
- Be adequate to compensate for all losses such as silting, evaporation, seepage, etc.
- Be adequate to provide ample water for other legal users of the source.

IV. Demands

The alternative of utilizing the city's WTP and Flint River as a water supply will be evaluated on the basis of supplying water to Flint's direct customers only. Although Flint currently supplies water to GCDC-WWS, for this analysis it is assumed that GCDC-WWS receives its primary water supply by another source. Table 1 summarizes the city's current and projected demands for direct customers of the city. Projections have been provided by city representatives.

Table 1: City Customer Demand Summary

	2010	2035
Average Day Demand (ADD)	14.0 mgd	15.0 mgd
Maximum Day Demand (MDD)	17.5 mgd	18.0 mgd

Actual water requirements will be greater than the amount of water provided to customers. About ten percent additional water must be added for treatment processes and system operation. Water for fire-fighting is not included in customer demands and must be added to the quantity of water needed.

Surface water sources must be adequate to supply water through a drought period. Although the MDD is projected to be 18 mgd, the sustained maximum demand over a longer period will be less than the MDD. Analysis of records of water use indicates that the 30-day sustained maximum demand is about 80% of the MDD. Table 2 summarizes the source water requirements to supply the city's future needs.

Table 2: Source Water Requirements

Future Maximum Day Demand (Customers)	18.0 mgd
Future Maximum Day Demand (WTP Backwash / Process Water)	2.0 mgd
Subtotal (Future Maximum Day Demand)	20.0 mgd
Sustained (30 day) Future Maximum Day Demand	(80% of MDD) 16.0 mgd
Replenish Water from Fire Fighting	0.7 mgd
Future Maximum Day Demand (Source Water)	16.7 mgd

V. Drought Flows

USGS records indicate that the most severe drought in Michigan occurred between 1930 and 1937, and that the low stream flows experienced during this period have a recurrence interval of 50 to 70 years. River flow records which include the drought of the 1930s will be used to evaluate the adequacy of the river as a permanent water source.

VI. Reservoir Losses

Both the Holloway Dam and Mott Dam were constructed since the drought period of the 1930s. If used to simulate the "design drought conditions", the records of flow on the Flint River from the 1930's should be adjusted for potential impact from the addition of these two dams and resulting reservoirs.

A. Evaporation

If the two reservoirs had existed during the drought period, the flows in the river would have been a little less because of the volume of water which would have been lost to evaporation from these two bodies of water.

B. Sedimentation

The July 2001 Flint River Assessment completed by the MDNR indicates that sedimentation occurs in the Holloway Reservoir at an accelerated rate, but does not provide specific volumes. Sedimentation reduces the storage volume of reservoirs. No investigation to determine the amount of sedimentation has been completed in the Holloway Reservoir since its construction, but the storage volume of the reservoir has certainly decreased since its construction.

Mott Dam maintains a fixed water level, so storage for water supply is not available. Therefore, sedimentation in Mott Lake is not a concern with respect to water supply.

C. Seepage

The land adjacent to both the Holloway Reservoir and Mott Lake has a relatively high groundwater table. Any loss of water by seepage from the bottom of the reservoirs seems likely to flow back to the river downstream of the respective dams, resulting in little or no impact to the quantity of water available for water supply or flow augmentation. Loss from the reservoirs by seepage is not considered a significant factor.

VII. Other Water Uses

Since 1967 when Detroit began supplying water to Flint, the Holloway Reservoir has been utilized as a backup water source, source of flow augmentation for the river, and for recreational purposes. Although the city maintains control over the dam and water levels; the city has leased their surrounding lands to the Genesee County Parks and Recreation Commission (GCPRC) for park, recreational, and conservation purposes. In 1987, the city and GCPRC adopted the Holloway Reservoir Management Plan (HRMP) which defined how water levels in the reservoir were to be maintained to achieve the goals above. The HRMP establishes a summer water level of 755 and a winter level of 751. Discharge from the reservoir is to be maintained above 65 cfs except when the level is less than 751; outflow from the reservoir is not to exceed inflow to the reservoir. A copy of the HRMP is included in Appendix 1.

Flow augmentation for the city's WWTP discharge is another consideration. The city's NPDES permit for their WWTP indicates that a Flint River drought flow of 85 cfs was used to determine the permitted limits for WWTP effluent. It appears that the HRMP requirement to maintain a 65 cfs minimum at the Holloway Reservoir was established to provide adequate flow in the river at the city's WWTP outfall. An excerpt of the city's WWTP NPDES permit is included Appendix 2.

The existing water supply contract between the city and Genesee County Drain Commissioner Division of Water and Waste Services (GCDC-WWS) provides that both the city and GCDC-WWS supply the other up to 8 mgd of finished water in the event of an emergency or supply disruption. For this analysis, it is assumed that the Flint WTP and river must be able to supply 8 mgd to GCDC-

WWS in the event of an emergency in addition to the quantity consumed by the city’s water customers. The need to provide backup to GCDC-WWS is assumed to be limited to a period of two weeks. Over a 14 day period, 125 million gallons of water should be reserved to meet the commitment for an emergency supply.

VIII. Analysis of Adequacy of Flint River

A detailed analysis of the adequacy of the Flint River as a water supply source is included in Appendix 3. This section provides an overview.

In 1977 when the HRMP was executed, water was not withdrawn from the Flint River for water supply. In 1977 without any withdrawal for water supply, the HRMP provided for a minimum discharge of 65 cfs from the Holloway Reservoir, to provide for a river flow of 85 cfs at the city’s WWTP. If water is withdrawn from the river for water supply, the minimum flow from the reservoir must be increased by the rate of WTP withdrawal if the 85 cfs base flow is to be maintained at the city’s WWTP. With Flint’s future sustained demand estimated to be 16.7 mgd (26 cfs), a minimum flow of 91 cfs (65 cfs + 26 cfs) will be needed from the Holloway Reservoir to maintain the 85 cfs base flow at the WWTP.

The United States Geological Survey (USGS) in a 1963 report Water Resources of the Flint Area Michigan examined the Flint River as a water supply for Flint. Using river flow records between 1930 and 1952, the USGS report includes a Draft-Storage curve for the Holloway Reservoir. If a minimum discharge of 91 cfs is to be maintained during a drought period, 6.2 billion gallons water would need to be withdrawn from the reservoir to supplement natural river flow.

In addition to the 6.2 billion gallons of storage to maintain the existing rates of flow in the river plus water supply, additional storage is required to provide GCDC-WWS an emergency supply and to make up for reservoir losses. The following table summarizes the total storage needed.

Table 3: Storage Requirements

Storage to meet sustained demand and WWTP flow	6.20 billion gallons
Storage to provide backup supply to GCDC-WWS	0.11 billion gallons
Storage to make up loss by evaporation	0.90 billion gallons
Storage lost by siltation	0.64 billion gallons (assumed)
Storage to provide loss by seepage	0.00 billion gallons
Storage Needed to Supplement River Flow	7.85 billion gallons

To provide 7.85 billion gallons of storage, the Holloway Reservoir operating level must be raised by at least three feet to 758 feet. Although possible, there are many challenges associated with operating the Holloway Reservoir at the 758 feet level.

- The existing drum gates used to control reservoir level are designed for adjustment over a four foot range (751 feet to 755 feet). The design of the dam is such that the existing gates cannot simply be replaced with larger ones to increase the upper level to 758 feet. The dam spillway will likely need to be reworked to accommodate the larger drum gates. Drawings showing the details of the dam are included in Appendix 4.

- Although operation at the 758 water level provides five feet of freeboard to the top of the dam, the watershed contributing to the reservoir is quite large and has resulted in quick increases in the reservoir level during extreme rain events. The reduction in freeboard will result in a reduced safety factor for managing flood events.
- Seepage through the earthen dam embankment will increase as a result of the increased hydraulic pressure with the higher water level. Increased seepage through the dam's embankment will reduce the strength and integrity of the embankment and is likely to increase maintenance needs.
- The 758 feet water level is based on an assumption regarding the loss of the reservoir volume by siltation. The depth of siltation should be measured to better determine the quantity of siltation and its impact on storage and reservoir level.
- Recreational activities, the fishery, and adjacent properties will be impacted by use of the reservoir for water supply. Normal water levels will be increased by three feet and during dry periods, the water levels may vary by several feet. During an extreme drought period, water levels may be as much as 11 feet below normal levels.
- If the 85 cfs drought flow at the city's WWTP cannot be achieved, a new NPDES permit with stricter discharge limits may issued by the MDEQ. This could result in higher WWTP costs for the city.

Analysis shows that without modification, the Holloway Reservoir can support a sustained maximum day demand of 11.6 mgd for water supply through a drought period.

IX. Dams

If the Flint River is to be used as water supply, existing dams will continue to be critical for management of the flows in the river and water supply. Following is a summary of the dams on and adjacent to the river.

Table 4: Summary of Dams

Facility	Construction Completed	Catchment Area (sq. mi.)	Surface Area (Acres)	Storage (Acre-Feet)	Ownership	Hazard Classification	Condition
Holloway Dam	1954	523	1,973	17,678	Flint	High	Good
Mott Dam	1972	612	684	0	GCPRC		Good
Kearsley Dam	1929	115	175	2,000	Flint	Significant	Satisfactory
Utah Dam	1928	729		0	Flint	Low	Poor
Hamilton Dam		748	17		Flint	High	Poor
Thread Creek Dam	1973	63	80	320	Flint	Significant	Poor

A. Holloway Dam

The Holloway Dam was last inspected in 2008 and was reported to be in good condition. A copy of the 2008 Dam Safety Report is included in Appendix 5. Other than routine maintenance, the following upgrades / modifications are recommended to provide a water supply of up to 11.6 mgd:

- Replacement of drum gate bearings
- Installation of river flow gage on North Branch of Flint River
- Improved instrumentation to measure and monitor gate positions and water surface level

If the river is to be used as a water supply of greater capacity than 11.6 mgd, additional modifications are required at the Holloway Dam to allow for operation at an increased water level. These improvements will include replacement of gates with larger ones and reworking of the dam spillway to accommodate the larger gates. The existing embankment should be armored to strengthen the dam's embankment and protect against erosion from wave action. A budget of \$2.57 million is established for the upgrades to the Holloway Dam to provide adequate capacity for the projected future demands.

B. Mott Dam

The Mott Dam is under the jurisdiction of the GCPRC. The reservoir level is maintained by a fixed weir so the reservoir volume is not available for storage. The dam has been reported to be in good condition.

C. Utah Dam

Utah Dam is inoperable and in poor condition. A copy of the 2008 Dam Safety Report is included in Appendix 6. Recent studies and evaluations conclude that the dam is of little benefit and should be removed. The 2010 Hamilton Dam Modifications and Riverfront Restoration PER provides a budget of \$1.9 M for removal of the Utah Dam, including replacement with a pedestrian bridge, construction of a boat launch, and local storm sewer upgrades.

D. Hamilton Dam

The Hamilton Dam is in poor condition and considered unstable. A copy of the 2008 Dam Safety Report is provided in Appendix 7. The dam has been the subject of extensive study and recommended for removal and replacement. The 2010 Hamilton Dam Modifications and Riverfront Restoration PER provides a budget of \$7.1 M for the removal and replacement of the dam, including ancillary upgrades to adjacent portions of the river.

The new Hamilton Dam is proposed at a lower elevation than the existing dam to reduce potential for flooding. A reduced water level upstream of the dam will reduce the water pool depth at the WTP intake, unless the Utah Dam is replaced or another dam is added. Testing of pumps at the WTP was completed to determine the impact of a reduced water depth at the WTP intake. Allowing for two feet of loss through the WTP intake screens after operation, reduction of the height of the Hamilton Dam by 1.5 feet or more will impact WTP's ability to draw water from the river.

E. Kearsley Dam

The Kearsley Dam is reported in satisfactory condition. Although the dam is located downstream of the city's WTP, water from the dam and Kearsley Lake supplements the river flow in advance of the Hamilton Dam, therefore contributing to the impoundment from which the WTP draws water. Water from the Kearsley Creek also serves to augment river flow at the city's WWTP located further downstream.

The storage volume of Kearsley Lake is relatively minor in relation to the storage deficit from Section VIII. Supplemental flows to the river from the Kearsley Creek are included in the USGS records included in this analysis

The dam is an important component of the city's water supply system because of its potential contribution to the WTP intake. Although currently in satisfactory condition, there will be ongoing maintenance needs to be addressed.

F. Thread Lake Dam

The Thread Lake Dam is reported to be in poor condition. Flow from the Thread Creek supplements the river flow prior to the city's WWTP. The storage provided by Thread Lake is negligible and flow from Thread Creek is included in the USGS records of river flow used for this analysis.

The Thread Lake Dam remains a facility of the city which because of its poor condition needs to be addressed. However, since the dam appears to be of little benefit to the water supply considered in this analysis, a budget for upgrades or removal has not been included in the costs for water supply.

X. Source Water Quality

Since the Flint WTP is the backup water supply in the event of a disruption to the supply from Detroit, raw water at the WTP intake is regularly sampled and analyzed. Available records provide a good understanding of the characteristics of the raw water and ranges of variances, and will be helpful to design water treatment processes and estimate operating costs.

Preliminary analysis indicates that water from the river can be treated to meet current regulations; however, additional treatment will be required than for Lake Huron water. This results in higher operating costs than the alternative of a new Lake Huron supply.

Although water from the river can be treated to meet regulatory requirements, aesthetics of the finished water will be different than that from Lake Huron. As an example, the temperature of water supplied to customers during the summer will be warmer than the present Lake Huron supply, because of the increased summer temperature in the relatively shallow river.

A detailed investigation of potential sources of contamination has not been completed. The MDEQ has reported that the Richfield Landfill is considering an application for an NPDES permit to allow

for discharge of stormwater and/or treated leachate to the Holloway Reservoir. If an NPDES permit is issued, there may be an impact on the quality of source water.

If used for water supply, a source water protection management plan should be developed to study the watershed, identify potential sources of contamination, and enact safeguards to prevent or control future threats.

XI. Water Treatment

For comparison with other alternatives, it is assumed that the Flint WTP will treat water from the river to provide a finished water of similar quality to the other alternatives being considered (continued Detroit supply and new Lake Huron supply).

A review of the city's WTP has been completed (Technical Memorandum, Cost of Service Study, Flint Water Treatment Plant prepared by Lockwood, Andrews, and Newnam (LAN), dated June 2011) to evaluate its ability to treat water from the river on a continuous basis to meet current and anticipated regulations and produce high quality finished water. Details regarding this review and analysis are provided in Appendix 8.

Although the WTP has been maintained and operated as a backup water supply, there have been numerous changes in regulations and standards since the WTP last supplied water on a continuous basis. Although equipment and systems at the WTP have been used sparingly, some existing equipment and systems require replacement from deterioration or obsolescence to provide reliability for continuous operation.

Following is a summary of upgrades needed.

A. Lime Sludge Disposal

Prior to supply of water by DWSD, the city's WTP disposed of lime sludge from water treatment operations at the Bray Road disposal site. The city is working with the MDEQ to address concerns at the Bray Road site; for this study it has been assumed that new sludge handling and disposal provisions will be utilized. Lime residual handling and disposal facilities have an estimated project cost of \$15.1 million. No costs have been included for remediation of the Bray Road site.

B. Soda Ash Feed System

Records of analyses of the source water indicate non-carbonate hardness. To remove the non-carbonate hardness and provide softening, soda ash should be added during treatment. The addition of a soda ash feed system has an estimated project budget of \$0.5 million.

C. Chemical Storage

Bulk chemical storage of at least 30 days is needed if the plant operates on a continuous basis. New storage tanks for liquid carbon dioxide, liquid oxygen, and liquid nitrogen will be needed. The project budget for chemical storage is \$2.1 million.

D. Electrical and SCADA

The power requirements of equipment at the WTP exceed the capacity of the substation which supplies the plant. Backup power generators at the WTP are not currently operable. Upgrades are recommended to power feeders for several of the existing systems. New SCADA is recommended to provide control and monitoring of operations at the WTP. The project budget for these upgrades is \$8.1 million.

E. Post Chlorination and Zebra Mussel Control

Zebra mussels are an invasive shell fish which have been introduced to the Great Lakes basin, including the Flint River. Zebra mussels can obstruct pipes and water intake screens. A sodium permanganate feed system is proposed for zebra mussel control. The project budget is \$0.3 million.

F. Security Issues

Additional security measures to guard against malevolent threats or terrorism which target the new water source will be required. A project budget for this is \$0.3 million.

G. Pumping System Improvements (Low and High Service Pumps in PS No. 4)

The pumps are in poor condition and their capacity is not consistent with the projected demands of the city. The pumps should be replaced with new, more efficient pumps. The project budget for these is \$7.8 million.

H. Filter Transfer Station to Dort Reservoir and UV Inactivation

Recent USEPA regulations require additional treatment or enhancement of existing treatment processes for microbial contaminants such as giardia, cryptosporidium, viruses, and bacteria. It is anticipated that enhanced contact time and ultraviolet light deactivation will be required to comply with these new standards. A project budget of \$7.0 million is established for compliance with the new surface water treatment rules.

I. Emergency Interconnect

The GCDC-WWS and City of Flint have a mutual aid agreement providing for each to provide the other up to 8 mgd of water as a back-up supply in the event of an emergency with either system's supply. A pumping station and piping interconnect is needed to effectively complete this exchange. The project budget for these upgrades is \$8.6 million.

The total of all WTP upgrades above is \$49.9 million.

In addition to upgrades to the treatment plant, there will be increased operating costs associated with the continuous operation of the WTP. For comparison with other alternatives for a long-term water supply, only the additional operational costs have been determined.

- Labor – Full scale operation of the WTP and dams on a continuous basis will require additional staffing. It is estimated that labor costs will increase by \$2,034,000 per year.
- Chemicals – The cost of chemicals used for water treatment are estimated at \$423 per million gallons of water produced.
- Residual Disposal – Disposal costs for lime sludge is estimated to be \$453,000 annually.

- Power – Increased power costs are estimated to be \$104 per million gallons of water produced.
- Ozone – Ozone treatment will be needed to meet new treatment standards. A budget of \$208,000 is assumed.
- Maintenance – Maintenance costs are assumed to be 20% of the O&M budget. Maintenance costs of the WTP and other facilities are expected to be relatively high because of the age of the facilities.

XII. Cost Summary

Upgrades to dams and the WTP will be needed for the Flint River to reliably supply drinking water on a continuous basis to Flint's customers. The cost of these upgrades is presented in the following table. Costs have been adjusted to an ENR Construction Cost Index of 8688 to allow for comparison with the 2009 Study. It has been assumed that design/construction commenced in 2010, to allow for comparison with the alternatives in the 2009 study.

Table 5: Project Costs

WTP Upgrades	\$49,888,000
Hamilton Dam Replacement	\$7,100,000
Holloway Dam /Reservoir Upgrades	\$2,570,000
Utah Dam Removal	\$1,900,000
Total Capital Cost	\$61,458,000

Costs shown are based on upgrades to existing facilities to supply the projected future maximum day demand of 18.0 mgd. These upgrades are based on the assumption that the HRMP is modified to allow for operation over a greater range of water levels. Other options for supplying the projected maximum day demand will result in higher costs.

Operating costs in the initial year of operation are estimated to increase \$7 million above current operating costs. Operating costs are projected to increase annually because of inflation and projected growth in demand over the study period.

Figure 1 shows the cost of water for Alternative 3, utilizing the existing WTP and Flint River for water supply. The cost of water is comprised of three components: continued purchase of water from Detroit during construction, debt for construction of facility upgrades, and ongoing operating costs.

Figure 1: Cost of Water Using Flint River as Source

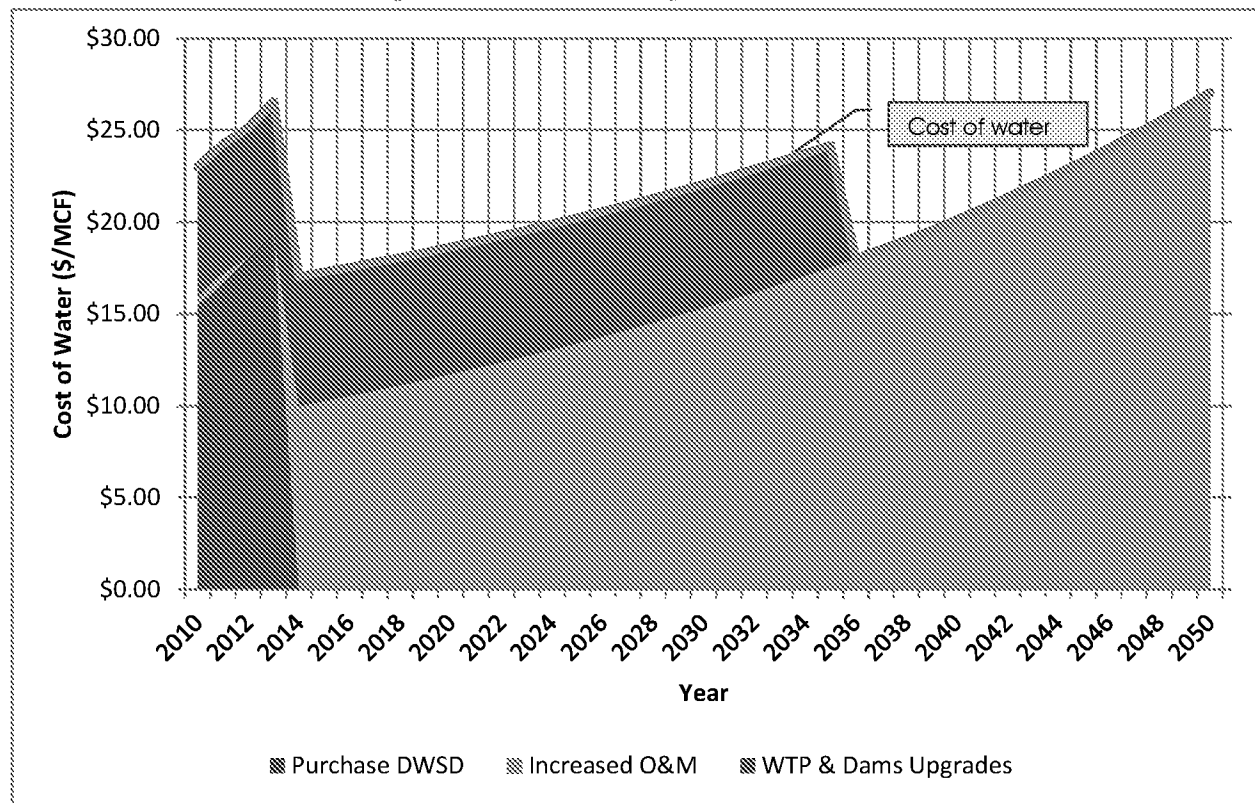
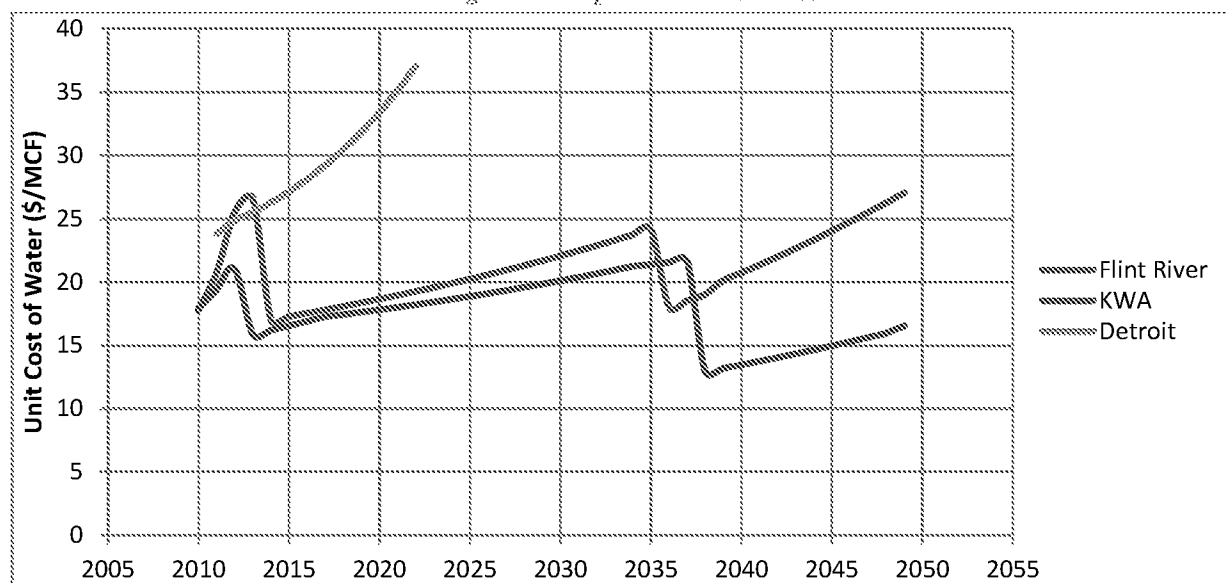


Figure 2 compares the cost of water for all three alternatives. Continued Supply by the City of Detroit results in a higher cost for water supply than the other two alternatives. The city's costs for The KWA-New Lake Huron Supply have been based upon the terms of the current KWA Raw Water Supply Contract, and the assumption that the city purchases 18 mgd capacity in the KWA system. The KWA alternative is projected to result in the lowest cost for water.

Figure 2: Comparison of Alternatives



XIII. Implementation

Planning, design, construction, and start-up will require 52 to 60 months for completion. Additional time may be required to address ancillary issues such as modifications to agreements, permits, and “non-construction related” environmental issues.

XIV. Intangibles

In addition to the upgrades identified for the dams and WTP, other issues will potentially need to be addressed if the Flint River is to be used as a water supply. Examples of these include:

- Environmental impact of work on dams or removal of sediment from the river or reservoirs
- Impact of construction and reservoir operation on the fishery
- Impact to recreational users and land owners adjacent to the Holloway Reservoir
- Potential upgrades to the city’s WWTP if river flows are reduced and stricter effluent limits are included in future NPDES permits
- Impacts of the replacement of the Hamilton Dam at a lower level for improved flood control may impact the ability for the WTP to draw water from the river
- Results of a Source Water Protection Plan which may identify potential threats of contamination or other impacts to the water supply

XV. Summary

Analysis indicates that the cost of supplying water from the Flint River on a continuous basis will be greater than the proposed KWA Raw Water Supply Contract, but less than continued supplied from Detroit. Additionally, if the Flint River is to be used for a water supply for city customers, there will need to be some modifications to existing facilities, operating agreements, and permits. Upgrades will be required at the city’s dams and the water treatment plant to reliably supply water to the city on a continuous basis. To meet the future maximum day demand of 18 mgd projected by city staff, one or more of the following will be required.

- Modify the Holloway Dam and Reservoir to provide additional storage
- Modify the HRMP to provide for more variance in water levels and/or modify limits on minimum discharge
- Modify the WWTP NPDES permit based on reduced flows in the river and provide resulting upgrades to WWTP for higher treatment
- Provide other raw water storage reservoirs

Addressing the preceding items is likely to require a great deal of time and effort because of the impacts on many other parties. Without making the modifications above, the river is limited to supplying a maximum day demand of about 11.6 mgd.

Appendices

1. Holloway Reservoir Management Plan
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3. Analysis of Adequacy of Flint River as a Water Supply
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8. Cost of Service Study – Flint Water Treatment Plant